

DEC 17 2015

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN  
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

**VANESSA COHOE,**

Defendant.

)  
)  
) CRIMINAL NO. 15 - 4533 JCH  
)  
) Count 1: 18 U.S.C. § 666(a)(1)(A):  
) Theft Concerning Programs Receiving  
) Federal Funds;  
)  
) Counts 2-9: 18 U.S.C. § 1163:  
) Embezzlement and Theft from Indian Tribal  
) Organizations.

INDICTMENT

The Grand Jury charges:

Count 1

From on or about December 15, 2010, and continuing to on or about May 19, 2011, in Rio Arriba County, in the District of New Mexico, the defendant, **VANESSA COHOE**, being an agent of an Indian tribal government, namely, the Purchasing Agent of the Jicarilla Apache Nation, an organization receiving in a one-year period benefits in excess of \$10,000 under a Federal program involving a grant, contract, subsidy, loan, guarantee, insurance, and other form of Federal assistance, did knowingly and willfully embezzle, steal, obtain by fraud and convert funds in excess of \$5,000, to wit: approximately \$23,039.23, owned by and under the custody and control of the Jicarilla Apache Tribe.

In violation of 18 U.S.C. § 666(a)(1)(A).

Count 2

On or about January 30, 2011, in Rio Arriba County, in the District of New Mexico, the defendant, **VANESSA COHOE**, knowingly and willfully embezzled, stole and converted to her own use in excess of \$1,000.00 in property belonging to an Indian tribal organization, by using Jicarilla Apache Nation's Sam's Club credit card for unauthorized personal purchases.

In violation of 18 U.S.C. § 1163.

Count 3

On or about February 18, 2011, in Rio Arriba County, in the District of New Mexico, the defendant, **VANESSA COHOE**, knowingly and willfully embezzled, stole and converted to her own use in excess of \$1,000.00 in property belonging to an Indian tribal organization, by using Jicarilla Apache Nation's Sam's Club credit card for unauthorized personal purchases.

In violation of 18 U.S.C. § 1163.

Count 4

On or about February 27, 2011, in Rio Arriba County, in the District of New Mexico, the defendant, **VANESSA COHOE**, knowingly and willfully embezzled, stole and converted to her own use in excess of \$1,000.00 in property belonging to an Indian tribal organization, by using Jicarilla Apache Nation's Sam's Club credit card for unauthorized personal purchases.

In violation of 18 U.S.C. § 1163.

Count 5

On or about March 3, 2011, in Rio Arriba County, in the District of New Mexico, the defendant, **VANESSA COHOE**, knowingly and willfully embezzled, stole and converted to her own use in excess of \$1,000.00 in property belonging to an Indian tribal organization, by using Jicarilla Apache Nation's Sam's Club credit card for unauthorized personal purchases.

In violation of 18 U.S.C. § 1163.

Count 6

On or about March 19, 2011, in Rio Arriba County, in the District of New Mexico, the defendant, **VANESSA COHOE**, knowingly and willfully embezzled, stole and converted to her own use in excess of \$1,000.00 in property belonging to an Indian tribal organization, by using Jicarilla Apache Nation's Sam's Club credit card for unauthorized personal purchases.

In violation of 18 U.S.C. § 1163.

Count 7

On or about March 23, 2011, in Rio Arriba County, in the District of New Mexico, the defendant, **VANESSA COHOE**, knowingly and willfully embezzled, stole and converted to her own use in excess of \$1,000.00 in property belonging to an Indian tribal organization, by using Jicarilla Apache Nation's Sam's Club credit card for unauthorized personal purchases.

In violation of 18 U.S.C. § 1163.

Count 8

On or about March 26, 2011, in Rio Arriba County, in the District of New Mexico, the defendant, **VANESSA COHOE**, knowingly and willfully embezzled, stole and converted to her own use in excess of \$1,000.00 in property belonging to an Indian tribal organization, by using Jicarilla Apache Nation's Sam's Club credit card for unauthorized personal purchases.

In violation of 18 U.S.C. § 1163.


Count 9

On or about April 2, 2011, in Rio Arriba County, in the District of New Mexico, the defendant, **VANESSA COHOE**, knowingly and willfully embezzled, stole and converted to her own use in excess of \$1,000.00 in property belonging to an Indian tribal organization, by using Jicarilla Apache Nation's Sam's Club credit card for unauthorized personal purchases.

In violation of 18 U.S.C. § 1163.

A TRUE BILL:

/s/  
FOREPERSON OF THE GRAND JURY

  
Assistant United States Attorney  
12/10/2015 4:12 PM